

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,  
COHEN BUSINESS LAW GROUP, PC and  
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

**DAWN DORLAND PERRY'S REQUEST FOR ENLARGEMENT OF TIME  
TO FILE MOTIONS TO COMPEL**

Dawn Dorland Perry ("Ms. Dorland") submits this Request For Enlargement Of Time To File Motions To Compel in the above-captioned litigation. In support of her Request, Ms. Dorland states as follows:

1. On April 5, 2021, this Court held a status conference concerning the discovery deadline in this matter and certain limited outstanding discovery issues, including but not limited to two (2) third-party subpoena responses.

2. While the Court set a deadline of two (2) weeks for Ms. Dorland to file a motion to compel concerning those subpoenas, the Court indicated that if more time was needed, it could be requested; and Ms. Dorland hereby makes said request in the interest of efficiency for the Court and said third parties.
3. Ms. Dorland had served subpoenas on various third parties, some of which remain outstanding at this time, due to extensions and delays related to various issues, including Covid-19, third-party sabbaticals, party issues, and other matters. These delays do not include disputes over the scope or content of the subpoenas.
4. Two of the third party subpoenas remain outstanding, however, the undersigned remains in contact with the third-parties, and the third-parties are cooperative, and are moving toward production.
5. In one circumstance, the third party, Middlebury College, represents that it has assembled the documents and is working to scan the documents for imminent production. The undersigned has no reason to doubt the veracity of those representations.
6. In the other circumstance, the undersigned has provided a draft protective order to the third party, which is the plaintiff's employer, for approval, and which is required prior to the production of the requested documents due to statutory requirements applicable to the nature of the documents requested. Counsel for the third-party assures the undersigned that the review will take place expeditiously, and there is no basis upon which to doubt the veracity of this representation.

7. During the April 5, 2021 status conference, the Court invited the undersigned to seek an extension to the two-week deadline in the event more time would be useful to resolving the outstanding document productions absent motion practice.
8. In this circumstance, where there is no dispute concerning the scope or fact of the production, the undersigned seeks an extension of time to permit the third parties to produce documents, rather than require said third parties to engage in expensive and time consuming motion practice where no dispute exists.
9. The requested extension of time will not prejudice any party or third party, where the parties are currently engaged in motion practice concerning party discovery, and a hearing is currently set for the end of this month.

WHEREFORE, Ms. Dorland requests an additional two (2) weeks to permit the production of documents in response to third-party subpoenas served prior to serving and filing motions to compel, to permit the cooperative production absent motion practice.

Respectfully Submitted,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

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Dated: April 19, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 19, 2021.

/s/ Suzanne M. Elovecky

Suzanne M. Elovecky (BBO #670047)